UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III

841 Chestnut Building Philadelphia, Pennsylvania 19107

SUBJECT:	RCRA Inspection Wheeling-Pittsburgh Steel Conf. Beech Botton WU DATE: 12/24/87 Douglas A. Donor, Environmental Scientist DELIMANUA DO NOTO TO THE DO NOTO TO THE DOUBLE DELIMANUA DE
FROM: J	Douglas A. Donor, Environmental Scientist DELMARVA DC MV PCPA Frances Scientist
	DELMARVA, DC, WV RCRA Enforcement Section (3HW15)
TO:	John A. Armstead, Chief (D) for J.A.A.

THE STATE IS TAKING ACTION TO RESOLVE THE VIOLATIONS IN THIS INSPECTION REPORT.

DEBLEMINA, DO, WY KOKA ELLOTCHMENT SECTION (SHWIS)

WE WILL MONITOR THE STATE ACTIVITY REGARDING RESOLUTION OF THESE VIOLATIONS.

Gen. Training, Contingent Plan, Open Container violation State Notice of Non Congeliano alladeel



STATE OF WEST VIRGINIA DEPARTMENT OF NATURAL RESOURCES DIVISION OF WASTE MANAGEMENT

ARCH A. MOORE, JR. Governor

IVISION OF WASTE MANAGEMEN 1260 Greenbrier Street Charleston, West Virginia 25311

RONALD R. POTESTA
Director

ROBERT K. PARSONS
Deputy Director

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

December 4, 1987

Ms. Nancy Ray Wheeling-Pittsburgh Steel Corporation Route 2 Beech Bottom, West Virginia 26030 RECEIVED

DEC 23 1987

Dear Ms. Ray:

Enclosed is a copy of the "Compliance Evaluation Inspection" (CEI) Report A completed on your facility by representatives of the Chief of the Division of Waste Management. This report is based on the inspection conducted on October 21, 1987.

In this report, please refer to the "Compliance Evaluation" section for those violations detected during the course of this inspection and "Notice of Non-Compliance" for the actions taken by the Enforcement Unit of this Division.

An additional copy of this report and "Notice of Non-Compliance" will be transmitted to the United States Environmental Protection Agency (U. S. EPA), Region III, Philadelphia, Pennsylvania.

Thank you for your assistance and cooperation during this inspection. If you have any questions concerning the inspection or attached report, please feel free to contact this office at 304/348-5929.

Sincerely,

DIVISION OF WASTE MANAGEMENT

Ava C. Zeitz

Compliance Monitoring and Enforcement Section Leader

ACZ/pd Enclosure

cc: Doug Donor, EPA, Region III
John Meeks, Enforcement Unit
David Swisher, Inspector

NOTICE OF NON-COMPLIANCE

Wheeling-Pittsburgh Steel Corporation W∨D000797720

On October 21, 1987, authorized representatives of the Chief of the Division of Waste Management conducted a Compliance Evaluation Inspection at your Beech Bottom, West Virginia facility. During the inspection the following items of non-compliance were noted:

- 1. The generator does not keep containers closed, except when necessary to add or remove waste. This is a violation of 40 C.F.R. § 265.173(a) as referenced by Sections 6.3.5.a.1 and 6.3.5.c.1 of the West Virginia Hazardous Waste Management Regulations (hereinafter the "Regulations").
- 2. The generator has not submitted copies of the contingency plan to all local police departments, fire departments, hospitals, and state and local emergency response teams that may be called upon to provide emergency services. This is a violation of 40 C.F.R. § 265.53 as referenced by Section 6.3.5.a.5 of the Regulations.
- 3. The generator has not conducted personnel training for all employees involved in hazardous waste management. This is a violation of 40 C.F.R. § 265.16(a),(b),(c),(d) and (e) as referenced by Section 6.3.5.a.5 of the Regulations.

This will serve as a **Notice of Non-Compliance** of the provisions of Chapter 20, Article 5E of the Code of West Virginia. In order to achieve compliance in the areas where the violations were observed, Wheeling-Pittsburgh Steel Corporation must perform the following remedial actions:

- 1. Upon receipt of this letter, ensure that all containers used to accumulate hazardous waste are kept closed, except when it is necessary to add or remove waste.
- 2. Upon receipt of this letter, submit copies of the contingency plan to all local police departments, fire departments, hospitals, and state and local emergency response teams that may be called upon to provide emergency services.
- 3. Within 30 days of receipt of this letter, ensure that all employees involved in hazardous waste management are properly trained and that proper documentation is established, in accordance with 40 C.F.R. § 265.16.

Wheeling-Pittsburgh Steel Corporation NON Page 2

4. Within 45 days of receipt of this letter, reply in writing to this office documenting that the requirements of this notice have been complied with.

Additionally, note that failure to keep containers closed is a repeat violation documented in the inspection of September 25, 1986. This office received notice from Wheeling-Pittsburgh Steel Corporation on March 9, 1987 that all previously noted areas of non-compliance had been corrected. To avoid elevated enforcement action in the future, Wheeling-Pittsburgh Steel Corporation must actually ensure that areas of non-compliance have been corrected and remain corrected.

If you have any questions concerning this matter, please contact Mr. John Meeks of the Enforcement Unit at 304/348-5929.

INSPECTION FACT SHEET

COMPANY NAME:

Wheeling-Pittsburgh

I. D. #: WVD000797720

Steel Corporation

MLAILING ADDRESS:

Route 2

TYPE OF FACILITY: Generator

Beech Bottom, West Virginia

26030

LOCATION:

COUNTY: Ohio

COMPANY CONTACT:

Nancy Ray

HANDLING CODES:

S01

Environmental Coordinator

S02

PHONE: (304) 234-2672

Compliance Evaluation Inspection

APPLICABLE REGULATIONS: West Virginia Hazardous Waste Management Act, Chapter 20-5E;

West Virginia Administrative Regulations for Chapter 20-5E;

and/or 40 CFR Part 265.

LIST OF CHEMICALS:

(For Small Quantity Generators, list amount of waste, how it is handled; where it goes)

D001

D002

D007

DATE INSPECTED:

October 21, 1987

INSPECTORS:

- (1)David B. Swisher, West Virginia Department of Natural Resources, Division of Waste Management
- (2) James R. Fenske, West Virginia Department of Natural Resources, Division of Waste Management

(3)

DATE PREPARED: October 26, 1987

PREPARED BY: David B. Swisher

TABLE OF CONTENTS

Inspection Report

Attachments:

A - Location Map

B - Site Map

C - Facility Entry Form

D - Checklist: Generators

E - Checklist: Containers

F - WWTP Sludge Analysis

G - Manifest: WWTP Sludge (D007)

H - Manifest: Waste Paint/Solvent

I - Manifest: Waste Petroleum Naptha (Safety Kleen)

INSPECTION REPORT

COMPANY: Wheeling Pittsburgh Steel Corporation - Beech Bottom Plant

DATE INSPECTED: October 21, 1987

INSPECTORS: David B. Swisher, West Virginia Department of Natural Resources,

Division of Waste Management

James R. Fenske, West Virginia Department of Natural Resources,

Division of Waste Management

DATE PREPARED: October 26, 1987

PREPARED BY: David B. Swisher, Division of Waste Management

On October 21, 1987 the above referenced inspectors conducted a Compliance Evaluation Inspection of Wheeling Pitt. Upon our arrival at 1000 hours we were met by Nancy Ray, Environmental Coordinator and Jim Allen, Superintendant of Maintenance, who had been previously advised of our intentions to inspect their facility via a phone conversation.

Upon presentation of appropriate credentials, we advised the officials of our authority as representatives of the Chief of the Division of Waste Management pursuant to Chapter 20 of the Code of West Virginia and as specified in Section 3007(a) of the Resource Conservation and Recovery Act and they acknowledged our authority. The facility representatives were informed that this inspection would emphasize the company's compliance with the Hazardous Waste Management Act (Chapter 20, Article 5E) and the regulations promulgated thereunder.

There have been no changes in hazardous waste operations at this facility since the last CEI (September 25, 1986). Wastes are generated as a result of cleaning and surface preparation of the metal prior to manufacturing metal products such as roof decks, steel mesh, and corrugated culverts.

The inspection began with a review of the facility's hazardous waste management files. The following items were reviewed:

- 1). Contingency Plan A copy of the contingency plan has not been submitted to the local emergency response agencies.
- 2). <u>Personnel Training</u> There was no hazardous waste training documented below supervisor level.
- 3). Manifests The WWTP sludge (D007) is shipped to Chem-Met, Wyandotte, MI for disposal (Attachment "G"). On October 26, 1987 I spoke with Bill Hartman of Chem-Met. He said that the sludge is solidified with limestone fines and then placed into a hazardous waste landfill.

The waste paint/solvent mixture is shipped to Ecolotech, Inc., Dayton, Ohio for incineration (Attachment "H"). There was no waste analysis for the paint waste on-site.

CEI (Wheeling Pittsburgh Steel - Beech Bottom Plant) October 26, 1987 Page two

(con't)

The facility has nine (9) Safety Kleen drums throughout the plant. The spent petroleum naptha is picked up and recycled by Safety Kleen Corporation (Attachment "I").

4). There were no annual reports or exception reports provided for inspection.

Following the file review, we conducted a physical inspection of the plant.

There is a satellite accumulation drum located in the paint mixing room (Attachment "B"). This drum receives paint solids, filters, and rags from their paint recycling operation. At the time of this inspection, the drum was not closed, nor was it labelled with the words "hazardous waste".

Two other areas of concern were the hazardous materials storage building and the wastewater treatment plant. The following observations were made in these areas:

- 1). Hazardous Materials Storage Building At the time of this inspection, we noted 34 drums of unused paint, 66 drums of used paint to be recycled, and 40 drums of paint waste awaiting shipment. There were also numerous drums of an oil/water mixture located in the back of the building. Mr. Allen indicated that the oil/water mixture is recycled to recover the oil. All of the paint waste drums were properly labelled and dated.
- 2). Wastewater Treatment Plant The WWTP sludge (D007) is collected in large hoppers after being dewatered. These hoppers are emptied into a large rolloff container located outside the treatment plant (Attachment "B"). Neither the hoppers nor the rolloff container are kept closed when not in use. The rolloff container is used to store the waste until it is shipped to Chem-Met (about 11 cubic yards once/week).

We also inspected the corrugating facility where the culverts are produced. The only hazardous waste generated in this operation is waste petroleum naptha (D001) from a Safety Kleen drum. This drum is serviced monthly by Safety Kleen Corporation.

Following the inspection, we thanked the facility representatives for their cooperation and assistance and departed.

CII (Wheelings Pittsburgh Steel - Beech Bottom Plant) October 26, 1987 Page three

COMPLIANCE EVALUATION

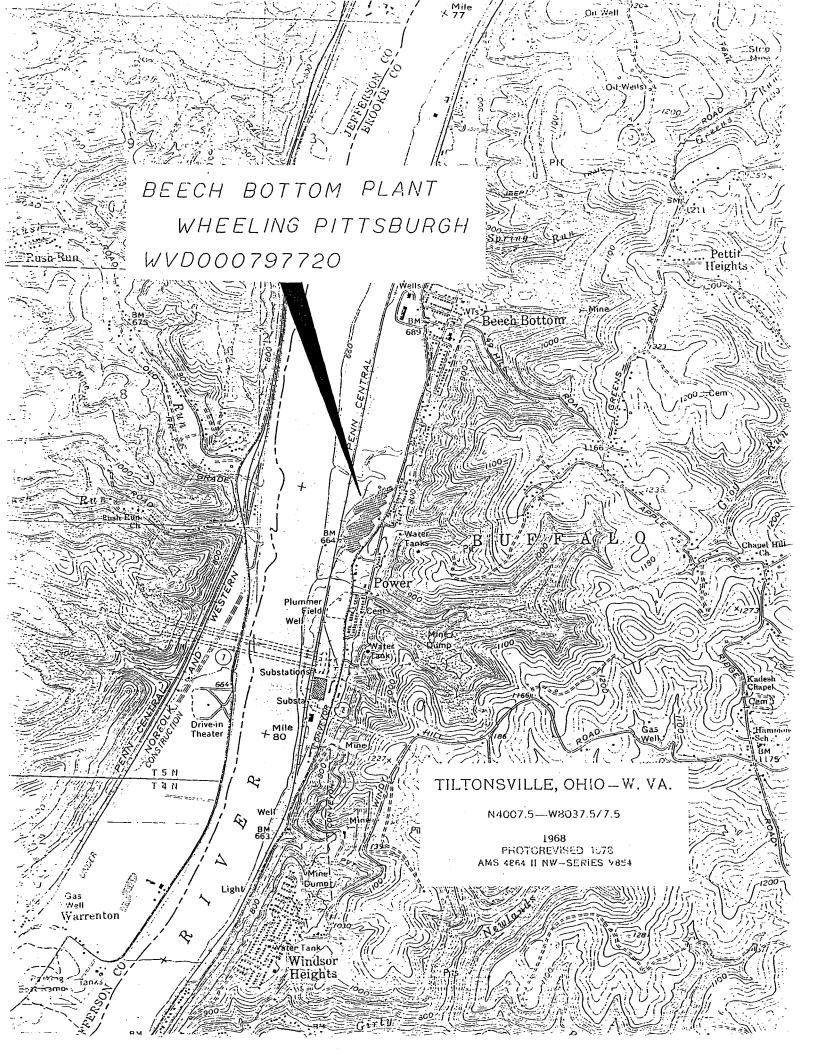
The following violations were found during this inspection:

- 1. This facility did not submit a copy of the contingency plan to the local police, fire departments, hospitals and emergency response teams, and therefore is in violation of 40 CFR 265.53 as referenced by Section 6.3.5.a.5 of the West Virginia Hazardous Waste Management Regulations (hereinafter "the Regulations").
- 2. This facility did not conduct personnel training for <u>all</u> employees involved in hazardous waste management and therefore, is in violation of 40 CFR 265.16 as referenced by <u>Section 6.3.5.a.5</u> of the Regulations.
- 3. This facility's satellite accumulation containers are not kept closed during storage. Therefore, the facility is in violation of 40 CFR 265.173(a) as referenced by Section 6.3.5.c.1.i of the Regulations.

CONCERNS

The following concerns were raised during the inspection:

- Storage of waste paint prior to recycling. As previously mentioned, there were 66 drums that had not yet been recycled. Mr. Allen indicated that they recycle about 20 drums per week. However, they do not keep any records of the amount of this material that is recycled. This material could possibly be subject to the definition of speculative accumulation as defined by the West Virginia Hazardous Waste Management Regulations.
- 2. Based on their most recent analysis (Attachment "F"), Wheeling Pitt has some questions as to whether or not the sludge should be considered a hazardous waste (note the EP Tox value for chromium).
- 3. Shipment of the paint/solvent waste as DOO1 (Attachment "H"). No analysis has been conducted to determine the constituents of the waste (ie. F-solvents, metals, etc.).



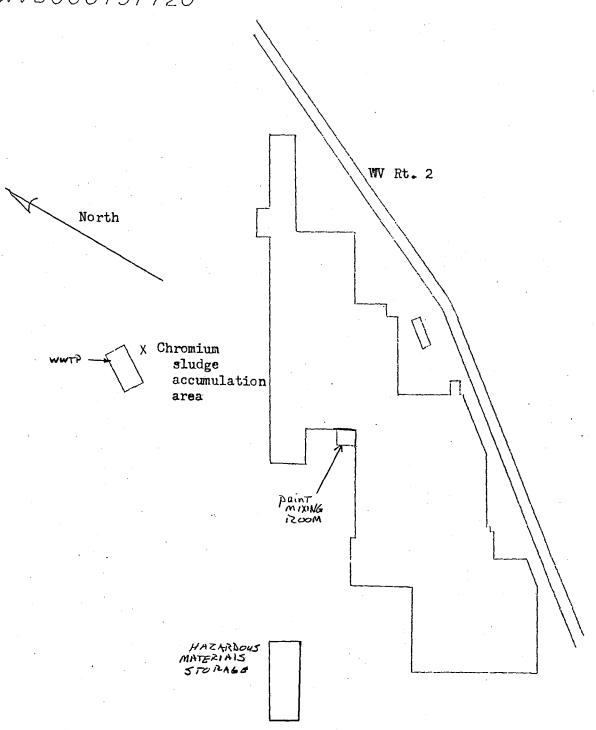
ATTACHMENT "B"

SITE MAP

BEECH BOTTOM PLANT

WHEELING PITTSBURGH

WVD000797720



ATTACHMENT C

FACILITY ENTRY FORM

Date Time presented his/her Identification Card and explained Inspecti Authorities to MANNY PAY	•		•			
Pate Time presented his/her Identification Card and explained Inspection Authorities to NANNY 249 Facility Representative WHEELING DITTS WAGEN STEEL - WICH STOMM Facility Authority for this inspection appears in Chapter Article 5E, Section 12 of the Code of West Virginia; in the Wivinginia Administrative Regulations for Chapter 20, Article of the Code of West Virginia, and the Resource Conservation Recovery Act (RCRA), Section 3007(a). This inspector is a duly authorized representative of Chief of the Division of Waste Management, West Virgin Department of Natural Resources and as such has the pow provided by Article 5E, Chapter 20 of the West Virginia Co	, this inspector	1010	at	21	October	0 n
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Chief of the Division of Waste Management, West Virgi Department of Natural Resources and as such has the pow provided by Article 5E, Chapter 20 of the West Virginia Co	st Virginia; in the West Chapter 20, Article 5 esource Conservation and	e of We ons for d the F (a).	the Cod Regulati nia, an ion 3007	n 12 of rative st Virg), Sect	E, Sectio Administ de of We Act (RCRA	Article 5 Virginia of the Co Recovery
Department of Natural Resources and as such has the pow provided by Article 5E, Chapter 20 of the West Virginia Co I consent to this inspection at $\underline{\textit{row}}$, on $\underline{\textit{oc7. 21}}$	·		•		·	
provided by Article 5E, Chapter 20 of the West Virginia Co I consent to this inspection at \underline{mov} , on \underline{mov} , on \underline{mov}	•					
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 $\mathbb{Z}_{+} = \underbrace{A_{+}G_{-}}_{S_{+}} \underbrace{S_{+}G_{-}}_{S_{+}} \underbrace{S_{+}G_$

West Virginia Hazardous Waste Management Regulations, Section 6
"Standards Applicable to Generators of Hazardous Waste"

,		
NAME OF FACILITY:	wheeling PittshupgH STEEL - BEECH BOH	com PLANT
ADDRESS: STATE	POUTE 2 Beech Rotton, WV. Sle	030
LOCATION:		
EPA GENERATOR I. D	: WYD060 797720	
FACILITY MISPESTION	PEPRESENTATIVE: NANCY RAY	
•	NMENTAL COORDINATOR	
TELEPHONE NUMBER:	(304) 234-2181	
fert. Regs. 20–5E HWMR	Are 1000 kg (2200 lbs.) or more hazardous waste produced by the generator facility in one month? (if the amount is less than 1000 kg per month, then the facility qualifies as a small quantity generator and the Small Quantity Generator Checklist should be completed.	(ES)
2.	What categories of hazardous wastes result from the generator's facility? A. Ignitable wastes (D001) B. Corrosive wastes (D002) C. Reactive wastes (D003) D. EP Toxic wastes Types: D007	YES NO YES NO
	HWMR Listed wastes:	



FD in if create, then the check it for TED fact by mout also be can betted.

•	4.	is the generator presently		<u></u> .
		A. Treating hazardous waste?	YES	
		B. Storing hazardous wastes longer than 90 days?	YES	0
	,	C. Disposing of hazardous waste?	YES	0
e.0201(a)	5.	Does the generator use the Uniform Hazardous Waste Manifest OMB control number 200-0404 on EPA Form 8700-22, and if necessary, EPA Form 8700-22A?	YES	≱:.
6.02.1.1(b)	£.	Does the generator designate on each manifest one facility which is permitted to handle the waste described on the manifest?	(Es)	ķi.o
6.02.01°e)	7.	Does the generator designate on each manifest one alternate facility which is permitted to handle his waste in the event an emergency prevents delivery of the waste to the primary designated facility?	YES	0
K.C2.C3	٤.	Does the manifest consist of at least the number of copies which will provide the generator, each transporter, and the owner or operator of the designated facility with one copy for their record and another copy to be returned to the generator		NO
6.03.65(a)	9.	Is all hazardous waste, within 90 days, either shipped off-site to a designated facility or placed in a permitted or iterim status on-site facility?		K
6.03.05(a)(2)	10.	Is the date upon which each period of accumula- tion begins clearly marked and visible on each container?	YES	ИС
6.03.05(a)(4)	11.	While being accumulated, on-site, is each contain and tank labeled or marked clearly with the world"Hazardous Waste"?		NC
	12.	Before transporting hazardous waste or offering hazardous waste for transportation off-site, does the generator		
6.03.01		A. Package?	ÆS	NO
6.03.02		B. Label?	P	NO
6.03.03		C. Mark?	YES	,NO
		each package of hazardous waste in accordance with Department of Transportation regulations?	(YES)	NO

eporcon ste piscaros in acon cance with applicable Decartment of Transportation regulations?



14. Does the generator keep a copy of each of the following for three years:

E.(4.01(a)

A. Manifests?



6.54.01(b)

B. Annual Reports and Exception Reports?



€.54.91(c)

C. Waste analyses, test results; and other determinations for wastes sent to onsite treatment, storage, or disposal?



* WASTE ANALYSIS FOR WWIT SLUDGE ONLY - NONE FOR PAINT WASTE

Questions 15 - 22 apply to generators who accumulate wastes in a non-permitted facility

40 C.F.R. 265.16(a)	¥ 15.	Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures?	YES	(NO)
Ć€F.15+±)(π)) ¥ 16.	Does the generator facility maintain a record of job titles for personnel that are involved with hazardous waste management and the name of the employee filling each job?	YES	NO
2€5.16(d)(2) ¥17.	Does the generator facility have on record a written position description for <u>each</u> job title noted in Question 16?	YES	NO
265.16(d)(3) ** 18.	Does the facility presently maintain a written description of the type and amount of introductory and continuing training for those employees listed in Question 16?	YES	NO
	19.	Has the generator facility installed the following requipment:		
265.32(a)	-	A. An internal communications or alarm system capable of providing immediate emergency instructions to facility personnel if the hazardous waste storage is threatened by fire or explosion?	YES	NO
265.32(b)		B. A device at the scene of hazardous waste generator operations capable of summoning emergency assistance from police, fire department, etc.	YES	ИО

1 to 12 5 20. Obesithe generation factory have abequare aisle space to allow the uncostructed mevement of personnel and equipment during emergencies? 21. Does the facility have a contingency plan which contains the following: 265.52(a) Detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous wastes to air, soil, or water? 265.52(c) B. A detailed description of arrangements formally agreed to by local police, fire departments, and state and local emergency response organizations? 205.52(d) C. A listing of names, addresses, and phone numbers of the generator facility emergency response coordinators? NOTE: This listing should include names and phone numbers of emergency coordinators on a 24-hour basis. 2f5.52(e) D. A listing of appropriate emergency equipment necessary to cope with emergencies at the (YES generator facility. 265.53 Has a copy of the Contingency Plan been submitted 22. to local police, fire departments, hospitals, and emergency response teams that may be called to provide emergency services? YES

First Inspector

Second Inspector

INSPECTOR'S NAME: DAVID B. Swisher	JAMES R. FRUSKE
TITLE: INSPECTOR, Swm	INSPECTOR, DWM
AGENCY: WILDNR	SUGUM
OFFICE LOCATION: WHEELING	WHEELING
INSPECTION DATE: OCT 21 1987	oct 21 1987

ATTACHMENT E

RESOURCE CONSERVATION AND RECOVERY ACT

CHECKLIST FOR USE AND MANAGMENT OF CONTAINERS

Subpart I, §265.170 "General Operating Requirements" as referenced by Section 8.1.6 for <u>TSD facilities</u> and 6.3.5.a.1 for <u>generators</u> of the West Virginia Administrative Regulations promulgated under Chapter 20, Article 5E of the West Virginia Code.

NAME OF FACILITY:	NHEELING AHSburgh STEEL - Beech Botton	1 Plan	<u> </u>
ADDRESS: STATE	ROUTE a Brech Bottom, WV. 26030		
LOCATION:			
EPA GENERATOR I. D	. #: WVD000 797720	- ,, 	
FACILITY INSPECTION	REPRESENTATIVE: NANCY RAY		· · · · · · · · · · · · · · · · · · ·
•	UMENTAL CORDINATOR	<u>.</u> ,	
TELEPHONE NUMBER:	(304) 242 234-278/		
all hazardous v	contained in this checklist apply to owners and operwaste facilities that store containers of hazardous vition 265.1 provides otherwise.		
Pert. Regs. 40 C.F.R. §265.			
265.171 1.	Are all containers in good condition, i.e., not showing signs of leakage or corrosion or any other deterioration/deformation?	YES	NO
265.172 2.	Are containers lined or made of materials compatible with hazardous wastes placed into them so that the container will not react or corrode with the hazardous wastes?	YES	NO
265.173(a) 3.	Are all containers holding hazardous waste kept closed during storage?	YES	NO
265.174 4.	Are areas where hazardous waste containers are stored inspected by the owner/operator at least once a week?	YES	NO
265.15(d) 5. 265.15(b)	Is an inspection log maintained?	YES	NO

265.176	• •	 Are containers holding ignitable or reactive waste located at least 50 ft. from the facility's property line? 	YES	NO
265.177(a)	7	 Are incompatible wastes placed in the same container? (see Appendix 5 for examples) 	YES	NO
265.177(c)	8	 Are storage containers holding hazardous wastes which are incompatible with nearby materials stored in containers, tanks, piles, or surface impoundments separated by dikes, 	N/A	
		berms, walls, or other devices?	YES	NO

First Inspector

Second inspector

INSPECTOR'S NAME: DAVID B. Swisher	JAMES R. FEUSKE
TITLE: INSPECTOR, DWM	INSPECTOR, DWM
AGENCY: WVDNR	WNDNR
OFFICE LOCATION: WHEELING	WITEGLING
INSPECTION DATE: OCT &1, 1987	OCT 21, 1987

ANALYSIS REPORT

LANCY LABORATORIES

Division, Lancy International, Inc.

Company Wheeling Pittsburgh - PADER Module 1 Report Date 4/28/87 (Rev. 5/11/87)

Beech Bottom Sludge PO#/Chg.#

Sample Lab Reference #	Waste 25819 (mg/Kg)	EPTOX Leachate 25820 (mg/L)	ASIM Leachate 25821	
Par ame ter	(mg/ kg)	(mg/ L)	(mg/L)	
pH (SU)	8.5	5.1*	8.6	
Solids, Total	37%	. -	_	
Solids, Total Dissolved	_	· –	172	
Solids, Volatile (of TS)	13%	-	16%	
Oil & Grease	1500	<4.0	-	
Ammonia-N	-	<0.1	-	
Cyanide, Total	<0.5	-	<0.01	•
Organic Carbon, Total	-	- :	8.3	
Organic Halide, Total	-	-	0.051	
Oxygen Demand, Chemical	-	- '	25	
Phenol	_	<0.005	_	
Heat Value (BTU/LB)	<500	-	-	
Antimony	-	<0.2	_	
Arsenic	<7	<0.018	. -	
Barium	300	<0.2		
Cadmium	1.0	<0.01	- '.	
Chromium, Hexavalent	-	-	<0.01	
Chromium, Total	7700	<0.05	_	
Copper	55	0.05	_ -	
Lead	120	<0.10	, -	
Mercury	<0.11	<0.004		
Molybdenum	10	<0.2	_	
Nickel	13 (g/Kg)	116	. -	
Selenium	<5	<0.012	-	
Silver	7.0	<0.01	<u> </u>	
Zinc	30 (g/Kg)	69	_	
Calcium	237 (g/Kg)	-	-	•
Chloride	533	-	· <u>-</u>	
Iron	43 (g/Kg)	<u>-</u>	-	
Ignitability	Non-Ignitable	e e	•	
Corrosivity (pH)	Non-Corrosiv			
Reactivity:	I .	r 40 CFR 261.23 (a)	(5))	
Cyanide, Total	<0.5		S = 1 1	
Sulfide, Reactive	904			
EP Toxicity	Non-EPToxic			
	*Initial pH:	9 1		
	Grams of Sample			
		acetic acid used:	390	
	FITTITITEES OF	acetic acid used:	380	

Metal Analyses on Waste Sample reported on a Dry Weight Basis.

C. John Ritzert, Manager-Technical Operations

Page ____ of ___



in the

MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-80-282-4708 OR OUT OF STATE AT 517-379-7880 AND THE NATIONAL RESPONSE 1-800-424-8602 24 HOURS PER DAY.

DO NOT WRITE IN THIS SPACE

Required under authority of Act 64, P.A. 19979, as amended and Act 136, P.A. 1969.

Failure to file is punishable under section 299.548 MCL or Section 10 of Act 138, PA. 1969.

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WASTE MANIFEST W. P 0 0 2 7 7 2 9 Bocument No	2 Page 1 Information in the shaded areas. Is not required by Federal.
3. Generator's Name and Mailing Address	A State Manifest Document Number 19 1
WHERLING-PITTSBURGH STREL CORP DOUTE 2, DESCH BOTTOM, BY 126030	MINISTRATION IN THE STATE OF TH
4. Generator's Phone 304) 234-2781 OR (304) 234-7628	E HVD 000 797 720
5. Transporter 1: Company Name 6. US EPA ID Number 7-7	Castate gransporter's ID
7. Transporter 2 Company Name 8. US EPA ID Number	Digransporter's Phone 800-221-6077 EState Transporter's Digramment
9. Designated Facility Name and Site Address 10. US EPA ID Number	E-Transporter's Phone
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.i 15. Special manuling instructions and Additional information	TATALOGUE BUIL CANA UN
	HUBGH STEEL, ENV. CONTROL DEPT
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurate proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condit	ly described above by ion for transport by highway
according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxici	
to be economically practicable and that I have selected the practicable method of freatment, storage, or	disposal currently available to me which minimizes the have made a good faith effort to minimize my waste
generation and select the best waste management method that is available to me and that I can	afford.
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Attachment H d for use on elite (12-pitch) typewriter.

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EPA Form 8700-22 (Rev. 4-85) Previous addition is too solete